

MIRIAM TAUBER LAW

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March 9, 2018

SO ORDERED:

HON. ALISON J. NATHAN
UNITED STATES DISTRICT JUDGE

Via ECF

Hon. Alison J. Nathan, U.S.D.J.
United States District Court (S.D.N.Y.)
40 Foley Square, Room 2102, New York NY 1007

Re: *Donoghue v. Monecor (London) Ltd.*,
No. 17-cv-8708-AJN ("*Finish Line*") & rel. case No. 17-cv-10083-AJN ("*Iconix*")

Your Honor:

I write on behalf of the Plaintiff in the above-captioned cases, pursuant to Rule 1(c) of Your Honor's individual rules of practice, and with the consent of all parties who have appeared, to request an adjournment of Plaintiff's March 12 deadline for responding to Defendant's Motion to Dismiss and Motion for Taking of Judicial Notice in each case (*Finish Line* Dkt. Nos. 25-27; *Iconix* Dkt. Nos. 16-18) (together, the "Motions"). Pursuant to Rule 3(f) of Your Honor's individual rules of practices and the Orders entered on February 27, 2018 in each case, Plaintiff has notified the Court and all parties that Plaintiff will rely on the Complaints on file (see, *Iconix* Dkt. Nos. 17, 20; *Finish Line* Dkt. Nos. 28, 29).

The parties propose the following briefing schedule for the Motions:

- Plaintiff will file their brief opposing Defendant's Motions in both cases on March 26, 2018.
- Defendant will file its reply to Plaintiff's opposition in both cases on April 9, 2018.

This is the first request for an extension of deadlines in connection with the pending Motions.

An initial pre-trial conference in both cases was previously scheduled before the Court on April 20, 2018 (see *Iconix* Dkt. No. 15; *Finish Line* Dkt. No. 22). The Court's order entered in *Iconix* adjourned the conference pending the resolution of the Motion to Dismiss (*Iconix* Dkt. No. 17), but the Court's similar order in *Finish Line* did not include the same adjournment (*Finish Line* Dkt. No. 28). The parties suggest that the docket be clarified to postpone the conference scheduled in both cases pending the resolution of Defendants' Motions.

Respectfully submitted,

s/ Miriam Tauber

Miriam Tauber
Attorney for Plaintiff Deborah Donoghue

